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Attorneys for Defendant
North American Title Insurance Company

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTIANA TRUST, A DIVISION OF
WILMINGTON SAVINGS FUND
SOCIETY, FSB, NOT IN ITS INDIVIDUAL
CAPACITY BUT AS TRUSTEE OF ARLP
TRUST 3,

Plaintiff,

vs.

NORTH AMERICAN TITLE INSURANCE
COMPANY,

Defendant.

Case No.: 2:19-cv-01782-APG-BNW

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT'S
TIME TO RESPOND TO THE
COMPLAINT**

(FIRST REQUEST)

Plaintiff Christiana Trust, a Division of Wilmington Savings Fund Society, FSB, not in its Individual Capacity but as Trustee of ARLP Trust 3 ("Christiana Trust") and defendant North American Title Insurance Company ("North American"), by and through their counsel of record, hereby stipulate as follows:

WHEREAS, Christiana Trust filed its complaint in this matter on October 14, 2019 (ECF No. 1);

WHEREAS, Christiana Trust served the complaint upon North American on January 6, 2020;

WHEREAS, North American's response to the complaint is currently due on January 27, 2020;

1 **WHEREAS**, North American's counsel was recently retained and requests additional time
2 to respond to the complaint.

3 **WHEREAS**, Christiana Trust does not oppose North American's request for an extension.

4 **WHEREAS**, this is the first stipulation for an extension of North American's time to
5 respond to the complaint.

6 Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate
7 and agree as follows:

- 8 1. North American shall file its response to the complaint on or before February 11, 2020.
9 2. North American intends to preserve its right and does not expressly waive any and all
10 defenses listed in Fed. R. Civ. P. 12(b).

11 Dated this 27th day of January 2020

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

/s/--Sophia S. Lau

By: _____
Sophia S. Lau, Esq.
Nevada Bar No. 13365
8716 Spanish Ridge Avenue, Suite 105
Las Vegas, Nevada 89148

Attorneys for Chicago Title Insurance Company

12 Dated this 27th day of January 2020

WRIGHT, FINLAY & ZAK, LLP

/s/--Lindsay D. Robbins

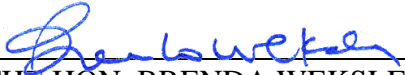
By: _____
Lindsay D. Robbins, Esq.
Nevada Bar No. 13474
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117

Attorneys for Christiana Trust, a Division of
Wilmington Savings Fund Society, FSB, not in its
Individual Capacity but as Trustee of ARLP Trust 3

ORDER

IT IS SO ORDERED:

13 Dated: 1/30/2020

By: 
THE HON. BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of EARLY SULLIVAN WRIGHT GIZER &
3 McRAE, LLP and that on January 27, 2020, the foregoing **STIPULATION AND PROPOSED**
4 **ORDER EXTENDING DEFENDANT'S TIME TO RESPOND TO THE COMPLAINT**
5 was served on all parties and counsel identified on the CM/ECF System via Electronic
6 Notification, including on the following counsel:

7
8 Lindsay Robbins
9 WRIGHT FINLAY & ZAK, LLP
7785 W. SAHARA AVE, STE 200
Las Vegas, NV 89117

11 /s/-D'Metria Bolden
12 D'METRIA BOLDEN